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February 26, 2024

By ECF

Honorable Robyn F. Tarnofsky
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

Re: *Musaffa LLC et al v. Yusupov*
Case no. 1:23-cv-10464-ALC-RFT

Dear Judge Tarnofsky:

This firm has just been retained as substitute counsel to Plaintiffs Musaffa, Inc and Musaffa LLC (collectively, “**Musaffa**”) in the above-referenced action. Musaffa filed a substitution of counsel form earlier today. Dkt. 21. In light of the substitution, and because the pleadings are not yet closed in this matter, we respectfully request a brief extension of the deadlines in the current Scheduling Order (Dkt. 15) to allow time for incoming counsel to familiarize itself with this matter and to conduct discovery tailored to matters in controversy in the pleadings. We propose the following amended discovery deadlines:

Activity	Original Date	New Proposed Date
Initial discovery requests	February 14, 2024	March 8, 2024
Initial interrogatories	February 21, 2024	March 15, 2024
Responses to discovery requests and production of documents	March 14, 2024	April 15, 2024
Completion of fact depositions	April 14, 2024	May 32, 2024
Completion of all fact discovery	May 23, 2024	May 31, 2024
Service of expert reports	None provided	June 21, 2024
Service of rebuttal reports, if any	None provided	July 12, 2024
Expert depositions	July 15, 2024	August 2, 2024

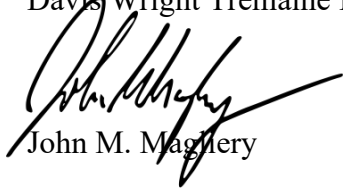
Musaffa does not seek to adjourn the upcoming Settlement Conference scheduled for April 19, 2024. *See* Dkt. 19. The timing of the settlement conference also suggests that the parties may wish to complete document discovery but not to invest time and resources in depositions until the parties determine if the settlement conference is fruitful.

This is the first request for an extension of time. Defendant consents to this request.

We are grateful for the Court's attention to this matter.

Respectfully submitted,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read "John M. Magliery", is written over the printed name.

cc: All Counsel of Record (by ECF)